

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA**

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IN RE: TOPP, PAUL, DEBTOR  
CHAPTER 12 BANKRUPTCY CASE NO: 23-30163

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**NOTICE OF APPLICATION TO EMPLOY LEGAL COUNSEL**

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NOTICE IS HERBY GIVEN that the above referenced Debtor has filed an Application to Employ Bulie Diaz Law Office and Sara E. Diaz as Legal Counsel. A copy of this application is attached and served upon you.

NOTICE IS FURTHER GIVEN that written objections to said application, if any shall be filed with the Clerk of the US Bankruptcy Court, Quentin N. Burdick Courthouse, 655 1<sup>st</sup> Ave. N. Suite 210, Fargo, ND 58102-4932 within FOURTEEN (14) days from the date of the mailing of this notice. Any objections not filed and served may be deemed waived.

Dated: May 22, 2023

BULIE DIAZ LAW OFFICE

By: /s/ SARA E. DIAZ

Sara E. Diaz

ND License #06069

3523 45<sup>th</sup> St. S. Suite 102

Fargo, ND 58104

(701) 298-8748

[sara@bulielaw.com](mailto:sara@bulielaw.com)

ATTORNEYS FOR DEBTOR

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA

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IN RE: PAUL TOPP, DEBTOR,  
CHAPTER 12 BANKRUPTCY CASE NO. 23-30163

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**APPLICATION TO EMPLOY LEGAL COUNSEL**

1. On May 22, 2023, the Debtor filed a petition for reorganization under Chapter 12 of Title 11 of the US Code with the Bankruptcy Court for the District of North Dakota and the Debtor remains in possession of his assets.
2. Applicants believe it is necessary and essential to employ legal counsel for the purpose of rendering legal advice and counsel as may be required by the Applicants during the Chapter 12 proceedings due of the diversity and ramifications of the various legal questions which have arisen, have been presented or may arise in the future and for the purpose of investigating and determining the interests of the Debtor in miscellaneous real and personal property, to bring such legal action as may be necessary to establish the Applicants' right in such property.
3. Applicants desire to retain and employ Bulie Diaz Law Office of Grand Forks and Fargo, North Dakota, an experienced law firm having familiarity with the laws of the state of North Dakota and the Federal Bankruptcy laws of the state, licensed to practice in North Dakota, to represent them in such matters, and in matters generally pertaining to the interests of the Debtor. According to the best knowledge, information, and belief of the Applicants, the same law firm has considerable experience in other bankruptcy proceedings. Sara E. Diaz will be primary counsel. Applicants desire that retention of Bulie Diaz Law Office be effective as of the date of filing of the Chapter 12 Petition.
4. As set forth in the Affidavit attached, and according to Applicants' knowledge, information and belief, Bulie Diaz Law Office represents no interest adverse to that of the Applicants herein, and

would fairly and impartially represent the Applicants in legal matters incident to these proceedings, subject to the limitations on compensation of said attorneys as provided in 11 U.S.C. 328.

Dated: 5-22-23

  
Paul Topp, Debtor

I, Paul Topp, a debtor in this case, declare under penalty of perjury that I have read the above and foregoing Application and that it is true and correct to the best of my knowledge, information and belief.

Dated: 5-22-23

  
Paul Topp, Debtor

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA**

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**AFFIDAVIT OF SARA E. DIAZ**

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Sara E. Diaz being first duly sworn on oath, states and alleges as follows:

1. I am an attorney at Bulie Diaz Law Office, an experienced law firm having familiarity with the laws of the State of North Dakota and the Federal bankruptcy laws and licensed to practice in the Federal and State Courts of North Dakota.
2. The Debtor in possession herein desireS to employ Bulie Diaz Law Office in the above-named proceeding as set forth in the Application filed with this affidavit. Sara E. Diaz will be primary counsel.
3. Neither the Affiant or Bulie Diaz Law Office holds or represents any interest adverse to the interests of the Debtor or the Estate herein. Further, Bulie Diaz Law Office and Affiant are disinterested parties of the Debtors.
4. If Bulie Diaz Law Office is retained and engaged as counsel for the Debtor in Possession, the law firm personnel will perform such services to the best of their ability and agrees to act in the capacity of legal counsel to the Debtor in these proceedings, with compensation for such services to be subject to approval of the Judge of this Court in accordance with 11 U.S.C § 328.
5. Bulie Diaz Law Office will seek compensation in these proceedings at the rate of \$300.00 per hour for attorneys including Sara E. Diaz, with work billed at a lesser rate (\$100.00/hr) for administrative work and paralegals, for services rendered to or for the benefit of the Debtors, plus reimbursement of costs and expenses incurred.

6. Bulie Diaz Law Office has available retainer funds from the Debtor, before payment of the filing fee, as follows:

Date: May 22, 2023: Retainer Funds: \$20,000.00

Dated this 22<sup>nd</sup> day of May, 2023:

/s/ SARA E. DIAZ  
Sara E. Diaz

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA

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**CERTIFICATE OF MAILING**

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Sara E. Diaz hereby certifies that on May 22, 2023 she served the attached:

Application to Employ Legal Counsel

Upon the following parties electronically through the CM/ECF Filing system or email:

Kyle L. Carlson, Chapter 12 Trustee: [info@carlsonch13mn.com](mailto:info@carlsonch13mn.com), [kcarlson13@ecf.epiqsystems.com](mailto:kcarlson13@ecf.epiqsystems.com)

Robert B. Raschke, US Trustee's Office: [USTPRegion12.SX.ECF@usdoj.gov](mailto:USTPRegion12.SX.ECF@usdoj.gov)

Dated: May 22, 2023

/s/ SARA E. DIAZ  
Sara E. Diaz  
Bulie Diaz Law Office